

REMARKS

In the Office Action dated March 15, 2004, claims 1-23 were rejected under 35 U.S.C. § 102 over U.S. Publication No. 2002/0001302 A1 (Pickett).

Applicant respectfully submits that claim 1 is not anticipated by Pickett. Claim 1 recites a specific combination of acts, including receiving, in a first switch, a call request over a packet-based network from a first terminal, where the call request targets a second terminal coupled to a second switch. In the Office Action, element 50A in Figures 18 and 19 of Pickett was identified as being the "first switch," and element 50C in Figures 18 and 19 was identified as being the "second switch." Although communications systems 50A, 50B, and 50C (depicted in Figure 18 of Pickett) are connected to each other over Ethernet or IP networks 410A and 410B, the communications systems 50A, 50B, and 50C are connected to WAN services 58A, 58B, 58C over *circuit-switched* connections (PRI, T-1). None of the communications systems 50A, 50B, or 50C is able to receive a call request *over a packet-based network* from any terminal connected to the WAN services 58A, 58B, or 58C, since any request received over the PRI or T-1 links is a request received over a circuit-switched network. There is also no teaching by Pickett that any of the communications systems 50A, 50B, 50C of Figure 18 is able to store information relating to features of the first terminal (the terminal that issued the call request). Also, there is no teaching of any of the communications systems 50A, 50B, 50C being able to send a media connection request to the first terminal, where the media connection request contains a network address of the second terminal.

In the Figure 19 arrangement of Pickett, Pickett does state that VoIP may be coupled to/from WAN service 58A and communications system 50A. Pickett, ¶ [0293]. The remaining telephones 12 are coupled to respective communications system 50A, 50B, 50C over circuit-switched lines (*see* Figure 3 of Pickett, which shows telephones 12 connected to POT interfaces within communication systems 50). However, there is no teaching in the discussion of the Figure 19 arrangement of the first switch (communications system 50A) storing information relating to features of the first terminal (a terminal connected to WAN service 58A). Moreover, there is no teaching in the Figure 19 discussion of sending, from the first switch (communications system 50A) to the first terminal (a terminal coupled to WAN service 58A), a media connection

request containing *a network address of the second terminal* to enable the first terminal to establish a media path with the second terminal over the packet-based network. Note that in the Figure 19 arrangement, as is typical of most communications between two terminals, the originating terminal already has the IP address of the destination node. There is no need whatsoever in the arrangement of Figure 19 for the communications system 50A to send to the first terminal (the originating terminal connected to WAN service 58A) a media connection request containing a network address of the second terminal to enable the first terminal to establish a media path with the second terminal over the packet-based network. Note that in the description of Figure 19, a packetized data stream may be received by the first communications system 50A, which then can forward the data stream without depacketizing to a second communications system, which in turn can also forward the data stream without the packetizing to a third communications system. Pickett, ¶ [0293]. This requires that the call request must already have the IP address of destination--therefore, there is absolutely no need for the communications system 50A to send to the originating terminal a media connection request containing a network address of the second terminal.

With respect to the claim 1 act of storing information relating to features of the first terminal, with the information associated with the logical identifier of the first terminal, the Office Action cited to ¶¶ [0064]-[0084], [0389]-[0391], and [0396], as well as Figures 3, 7A, 9A, 16E-17D of Pickett. The Office Action especially identified ¶ [0067]. Paragraph [0067] refers to using a DHCP server to enable the dynamic assignments of IP addresses. However, this has nothing to do with storing information relating to features of a first terminal. Paragraphs [0389]-[0391] refer to settings that are used for routing IP telephony calls. Again, settings used for routing calls is not the same as storing information relating to features of the first terminal, where such information is associated with a logical identifier. Paragraph [0396] of Pickett describes a database table for an IP call destination. The database table contains codec preferences, jitter buffer sizing, echo cancellation settings, and volume settings. However, the database table contains information for an IP call *destination*, not information relating to features of the first terminal (the originating terminal).

In view of the foregoing, it is respectfully submitted that Pickett does not disclose all the features of claim 1. Independent claim 23 is allowable over Pickett for reasons similar to those of claim 1.

With respect to independent claim 14, Pickett fails to disclose a switch system that has a controller to receive a call request over a packet-based network from a first terminal, the first terminal being associated with a logical identifier, in combination with a storage unit containing information relating to features of the *first terminal*, where the information is associated with the logical identifier of the first terminal. As noted above, the database table described in ¶ [0396] of Pickett refers to preferences for an IP call destination, not an IP call source (which in claim 14 is the first terminal).

Independent claim 22 is also allowable over Pickett, which fails to disclose the combination of the following acts: receiving a request over a packet-based network from a first terminal associated with a logical identifier, and accessing a profile associated with the logical identifier (which is the logical identifier of the terminal that originated the request). The database table noted in ¶ [0396] of Pickett refers to information of the IP call *destination*.

Dependent claims are allowable for at least the same reasons as corresponding independent claims. Moreover, with respect to claim 2, which depends from claim 1, there is no teaching in Pickett of receiving a call request (over a packet-based network) that includes receiving an *off-hook indication* and a dialed number. The Office Action cited to Figures 22 and 25-29 as teaching such a feature. Applicant notes that Figures 22 and 25-29 describe a user interface on a telephone device. However, there is no indication in these Figures of receiving a call request over a packet-based network that includes receiving an off-hook indication and a dialed number. Paragraph [0076] of Pickett refers to off-hook detect provided by cards 82 connected to the TDM bus 78. This off-hook detect refers to detecting off-hook of a telephone connected by a circuit-switch line. Similarly, in ¶ [0106], reference is made to detecting an off-hook condition of a circuit-switch line. Neither of these two passages relate to receiving a call request over a packet-based network that includes receiving an off-hook indication and a dialed number.

With respect to new claim 24, which depends from claim 1, Pickett fails to disclose that sending the media connection request from the first switch to the first terminal enables the first terminal to establish the media path with the second terminal, wherein the media path *does not pass through* the first and second switches. That is clearly not the case in the arrangements shown in Figures 18 and 19, as well as in the other figures of Pickett, such as Figures 47A, 47B, 48A, 48B, 48C, 48D, and 48E, where the media path *must* go through the communications systems 50. Similarly, with respect to dependent claim 26, which depends from claim 1, there is no teaching in Pickett of the first switch interacting with the first terminal to establish a call session based on the call request, and the media connection request from the first terminal enabling the first terminal to establish a media path of the call session with the second terminal *without passing through the first and second switches*.

With respect to new claim 25, which depends from claim 1, there is no teaching whatsoever in Pickett of storing information relating to a speed dial feature of the first terminal that is coupled to the first switch over a packet-based network.

Claim 27, which depends from claim 14, is further allowable over Pickett for the reason that Pickett does not disclose a controller adapted to send a media connection request to the first terminal, where the media connection request contains a network address of the second terminal to enable the first terminal to establish a media path with the second terminal over the packet-based network.

New claims 28, 30, and 32 are allowable over Pickett for reasons similar to those of claim 26.

New claim 29 is allowable for reasons similar to claim 27, and new claims 31 and 33 are allowable for reasons similar to those of claim 25.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (NRR.0012US).

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Respectfully submitted,

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